

COUNT 3

On or about June 25, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE DOCUMENT TO FILE WITH THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did unlawfully knowingly procure or offer any false or forged instrument to be filed, registered, or recorded in any public office within this state, which instrument, if genuine, might be filed, registered, or recorded under any law of this state or of the United States, to wit: LABORATORY ID 1403-079 (BATCH #E40317.S, DATE SAMPLE RECEIVED 3-15-14).

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COUNT 4

On or about August 28, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE DOCUMENT TO FILE WITH THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did unlawfully knowingly procure or offer any false or forged instrument to be filed, registered, or recorded in any public office within this state, which instrument, if genuine, might be filed, registered, or recorded under any law of this state or of the United States, to wit: as LABORATORY ID 1404-105 (BATCH #C40423.S, DATE SAMPLE RECEIVED 4-23-14).

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COUNT 5

On or about October 9, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE DOCUMENT TO FILE WITH THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did unlawfully knowingly procure or offer any false or forged instrument to be filed, registered, or recorded in any public office within this state, which instrument, if genuine, might be filed, registered, or recorded under any law of this state or of the United States, to wit: LABORATORY ID 1406-084 (DATE SAMPLE RECEIVED 6-13-14).

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COUNT 6

On or about October 22, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE DOCUMENT TO FILE WITH THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did unlawfully knowingly procure or offer any false or forged instrument to be filed, registered, or recorded in any public office within this state, which instrument, if genuine, might be filed, registered, or recorded under any law of this state or of the United States, to wit: LABORATORY ID 1402-005 (DATE SAMPLE RECEIVED 1-31-14).

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COUNT 7

On or about November 11, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE DOCUMENT TO FILE WITH THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did unlawfully knowingly procure or offer any false or forged instrument to be filed, registered, or recorded in any public office within this state, which instrument, if genuine, might be filed, registered, or recorded under any law of this state or of the United States, to wit: LABORATORY ID 1406-167 (BATCH #C40630.S, DATE SAMPLE RECEIVED 6-27-14).

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COUNT 8

On or about December 29, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE DOCUMENT TO FILE WITH THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did unlawfully knowingly procure or offer any false or forged instrument to be filed, registered, or recorded in any public office within this state, which instrument, if genuine, might be filed, registered, or recorded under any law of this state or of the United States, to wit: LABORATORY ID 1409-066 (BATCH #C40915.S, DATE SAMPLE RECEIVED 9-13-14).

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COUNT 9

On or between June 4, 2014 and December 29, 2014, in the County of Los Angeles, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: MONEY the property of the State of California.

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COUNT 10

On or about June 4, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data, to wit: LABORATORY ID 1404-139 (BATCH #A40428.S, DATE SAMPLE RECEIVED 4-26-14).

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COUNT 11

On or about June 25, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data, to wit: LABORATORY ID 1403-074 (BATCH #A40314.S, DATE SAMPLE RECEIVED 3-14-2014).

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COUNT 12

On or about June 25, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data, to wit: LABORATORY ID 1403-079 (BATCH #E40317.S, DATE SAMPLE RECEIVED 3-15-14).

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COUNT 13

On or about August 28, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data, to wit: LABORATORY ID 1404-105 (BATCH #C40423.S, DATE SAMPLE RECEIVED 4-23-14).

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COUNT 14

On or about October 9, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data, to wit: LABORATORY ID 1406-084 (DATE SAMPLE RECEIVED 6-13-14).

* * * * *

COUNT 15

On or about October 22, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data, to wit: LABORATORY ID 1402-005, (DATE SAMPLE RECEIVED 1-31-14).

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COUNT 16

On or about November 11, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data to wit: LABORATORY ID 1406-167 (BATCH #C40630.S, DATE SAMPLE RECEIVED 6-27-14).

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COUNT 17

On or about December 29, 2014, in the County of Los Angeles, the crime of CAUSING FALSE DATA TO BE UPLOADED TO THE STATE OF CALIFORNIA, in violation of PENAL CODE SECTION 502(c)(1), a Felony, was committed by CALTECH ENVIRONMENTAL LABORATORIES, LLC and YAGHOUBI, ROOBIK, who did willfully and knowingly access and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data, to wit: LABORATORY ID 1409-066 (BATCH #C40915.S, DATE SAMPLE RECEIVED 9-13-14).

It is further alleged as to counts 1-17, offenses described in Penal Code section 803(c), that the above violations were not discovered until after November 7, 2014 when ELAP conducted an unannounced visit to the Defendant's place of business pursuant to H&SC Div 101 section 100865 (regular site visits conducted pursuant to Title 22, CCR section 64807). On November 26, 2014, ELAP chemist Miriam Ghabour realized that the data received during the November 7, 2014 site visit was wrong (raw data from the instrument did not match data reported to the client). On August 26, 2015, a search warrant was conducted of the Defendant's place of business premises which resulted in the seizure of the documents that substantiated the above charges.

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

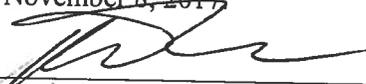
NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendants CALTECH ENVIRONMENTAL LABORATORIES, LLC and ROOBIK YAGHOUBI for the above-listed crimes. Wherefore, a warrant of arrest is requested for ROOBIK YAGHOUBI.

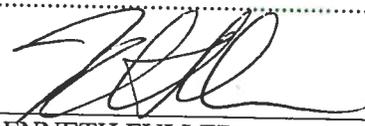
I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA450757, CONSISTS OF 18 COUNTS.

Executed at LOS ANGELES, County of Los Angeles, on November 8, 2017.



THOMAS DOAN
DECLARANT AND COMPLAINANT

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JACKIE LACEY, DISTRICT ATTORNEY

BY: 

KENNETH FULLER
DEPUTY DISTRICT ATTORNEY

AGENCY: Calif. Environmental Protection Agency,
State Water Res Ctrl Board

I/O: Kim, Sellards

ID NO.:

PHONE : (916) 952-7554

DR NO.:

OPERATOR: ESM

PRELIM. TIME EST.: 3 Days

DEFENDANT
YAGHOUBI, ROOBIK

CII NO.

DOB
09/11/1961

BOOKING
NO.

BAIL
RECOM'D
\$160,000

CUSTODY
R'TN DATE

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant, the warrant is so ordered.

ROOBIK YAGHOUBI

BAIL: \$ _____

DATE: _____

Judge of the Above Entitled Court

NON-WARRANT DEFENDANTS:

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
CAL TECH ENVIRONMENTAL LABORATORIES, LLC		1/1/2001		\$0	11/30/2017

CAL TECH ENVIRONMENTAL LABORATORIES, LLC

_____ Dollars

ROOBIK YAGHOUBI

_____ Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

CAL TECH ENVIRONMENTAL LABORATORIES, LLC

_____ in Dept _____

ROOBIK YAGHOUBI

_____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate